

# Implementation Guidance for Ozone/PM NAAQS and Regional Haze

Policy for 8-hour ozone standard, PM<sub>2.5</sub>  
and regional haze

# Contents of Guidance

- **Proposed Implementation Guidance (IG) - comment period closed Sep 23, 1998**
  - **Ozone and PM10 classification scheme: designation/classification dates, SIP due dates, and attainment dates**
  - **RACM/RACT for ozone and PM SIPs**
  - **SIP requirements for ozone transitional areas and PM10 areas**
  - **Placeholders for additional guidance**

## Contents of Guidance (cont)

- Remainder to be proposed Nov 1998 (comment period will be reopened)
  - Emission Inventories/modeling/attainment demonstration
  - Reasonable further progress
  - Nonattainment area boundaries/Corrective actions/Contingency planning
  - Framework for planning

## Important Points

- 8-hour ozone standard under subpart 1 - more flexible than subpart 2 (1-hour standard)
- Revised PM10 standard under subpart 4
- Need PM2.5 air quality data to fully understand PM2.5 NAAQS program but lay out PM2.5 implementation principles now to ensure coordination (will be governed by subpart 1)

# Classification Schemes

## Ozone Classification Scheme

<b>Classification</b>	<b>Desig/Class Date*</b>	<b>SIP Due Date*</b>	<b>Attainment Date*</b>
Transitional	July 2000	Sep 1999/ May 2000	Dec 2005
Traditional	July 2000	July 2003	Dec 2007, 2009 or 2010
International transport	July 2000	July 2003	Dec 2007

\*Dates are "no later than"

## Definition of Ozone Attainment Date

- Attainment is defined as the date by which control measures are implemented by the State, such that the area attains the standard with 3 years of clean data
  - 3-year average of the 4th-highest daily maximum 8-hour average ozone concentration less than or equal to 0.08 ppm
- Definition revised since August draft based on comments received
  - Previously, attainment was defined as the date by which control measures are implemented by the State, such that the area has 1 year of clean data (the 4th highest daily max 8-hr avg < 0.08 ppm)

## PM10 Classification Scheme

<b>Classification</b>	<b>Desig/Class Date*</b>	<b>SIP Due Date*</b>	<b>Attainment Date*</b>
Moderate	July 2000	Jan 2002	Dec 2006
Serious	NA	Depends on date of reclass and SIP	Dec 2010

\*Dates are "no later than"



## PM2.5 Classification Scheme

- ▶ For the PM2.5 NAAQS, too early for a classification scheme - need to wait for data
- ▶ But, if PM2.5 regional like ozone, then minimal PM2.5 classifications and look at ozone approach
- ▶ Evaluate new data and issue final classifications guidance before designations
- ▶ Per Presidential Directive, PM2.5 control measures not required until after the PM2.5 standards are reviewed and designations made

# Ozone SIP Requirements

# Attainment Demonstration

- Transitional areas that attain via NOx SIP call
  - Rely on NOx SIP call emission inventory and modeling
- Transitional areas that need measures beyond the NOx SIP call (SIP call areas)
  - No additional modeling required (possible additional analyses if projected air quality concentrations much greater than NAAQS)
  - Use information and techniques which EPA will provide (draft Nov 98; final Dec 98)

## Attainment Demonstration (cont)

- ▶ Transitional areas inside OTAG but no SIP call
  - No new modeling if projected air quality concentrations close to NAAQS
  - Additional analysis if projected air quality concentrations much greater than NAAQS
- ▶ Transitional areas outside the OTAG domain
  - Additional modeling required if none exists
  - Use information and additional EPA-developed techniques in document

## Attainment Demonstration (cont)

### ► Traditional areas

- Modeled attainment test relying on ambient data
- Use model in "relative" rather than "absolute" fashion with optional weight of evidence test to reduce uncertainty
- Encourage use of CMAQ/MODELS3, subject to same criteria as "alternative" models; EPA will not identify "guideline" model
- Areas that come into attainment as result of the NOx SIP call may also rely on EPA modeling.

### ► International transport areas

- Demonstrate attainment "but for" international emissions
- Use same guidance as traditional areas
- Subject to negotiation between Region and State based on area specific characteristics

# RACM/RACT

- Overall policy
  - If plan demonstrates attainment, RACM/RACT met and additional measures not required as "reasonably available"
- Transitional areas
  - NOx SIP call plus attainment SIP with additional measures, as needed
- Traditional areas
  - Attainment SIP
- International transport areas
  - "But for" attainment SIP

# Reasonable Further Progress

- **Transitional areas**
  - **Emission reductions needed for attainment**
  - **Areas that attain via NOx SIP call**
    - **NOx SIP call emission reductions on schedule**
  - **All other areas**
    - **Rely on NOx SIP call, as applicable**
    - **Additional control measures implemented by May 1, 2003**

## Reasonable Further Progress (cont)

### ► Traditional areas

- Emission reductions needed for attainment
- Test of making RFP: meet control measure implementation date (generally 3 monitoring years before attainment date)
  - for 8-hour nonattainment - May 1, 2005
  - for 1- and 8-hour nonattainment - May 1, 2005, 2007 or 2008
- Areas where 1-hour NAAQS still applies must still meet subpart 2 rate of progress requirements (3% /year reductions)
- Corrective actions
  - If failure to implement measures, make finding of failure to implement
  - start sanctions



## Reasonable Further Progress (cont)

- International transport areas
  - "But for" attainment emissions
  - Follow same guidance as traditional areas - control measures implementation date - May 1, 2005
  - Subject to negotiation between Region and State based on area specific characteristics

# Supplemental Attainment Planning

- ▶ Section 179(c) and (d) sets forth process for when an area fails to attain a NAAQS
- ▶ Guidance proposes early process for State to automatically revise SIP in advance for potential failure to attain
- ▶ Relies on enforceable SIP commitment to analyze the cause of the potential failure and to revise the SIP 2 years after implementation if the area has 2 years unclean data
  - New attainment demonstration and list of measures (not yet adopted)
  - Submit 18 months after determination of 2 unclean years data

## Supplemental Attainment Planning (cont)

- Under section 179(c), 6 months after the attainment date, EPA determines if area attained the NAAQS
  - If failure to attain, State submits adopted measures in 1 year which provide for attainment
  - New attainment date established

# NSR and Transportation Conformity

- **Transitional areas**
  - For NSR, see forthcoming rule
  - For transportation conformity, see forthcoming rule
- **Traditional and international transport areas**
  - Program under current EPA regulations

# PM2.5 SIP Requirements

- **RACM/RACT**
  - Similar to approach for revised ozone and PM10 standards
  - EPA will provide further guidance
  - Per Presidential Directive, PM2.5 control measures not required until after the PM2.5 standards are reviewed and designations made
- Further guidance to be provided on other requirements

## **Other Related Implementation Guidance Issues**

# Nonattainment Area Boundaries

## ► Ozone

- Strong presumption of C/MSA, but allow exceptions
- Can expand area to include additional counties with contributing sources
- Rural nonattainment areas can be counties
- Select area smaller than C/MSA for transport problem expected to be solved thru regional control (e.g., NOx SIP call)
  - Minimum - county with violation
  - Exceptionally large counties or C/MSAs (e.g., some in west) can be split.
- Where 1-hr NAAQS applies - larger of C/MSA or 1-hr nonattainment area
- International transport areas - status quo from 1-hr nonattainment area

## Nonattainment Area Boundaries (cont)

### ► PM2.5

- Too early for firm guidance, but may be similar to ozone
- Factors for consideration:
  - Localized contributions
  - Near field/short range transport considerations
  - Long range transport areas
- Initial thoughts -- if PM2.5 is like ozone, start with same approach to boundaries as ozone



# Framework for Planning

## ► Need for framework:

- Ozone, PM2.5, regional haze - pollutants are not confined locally - require approach addressing areas outside immediate problem area
- Need to apply the level of planning appropriate to the level of the problem
- Substantial evidence regarding transport of pollutants leading to regional haze, PM2.5, and ozone problems
  - Common precursors, atmospheric processes, spatial patterns
- EPA recognizes need for future regional planning efforts for regional haze and the NAAQS
- For regional haze, all States will need to participate initially in regional coordination due to nature of visibility impacts and long-range transport

## Framework for Planning (cont)

- Scope of framework:
  - Regional scale planning
  - Areas affected by transport
  - Intrastate transport
  - SIP credit and requirements for all geographic scales
- Regional scale planning
  - Provides principles for
    - Process
    - Technical assessment
    - Strategy development and adoption
    - EPA participation

## Framework for Planning (cont)

- For SIP attainment (including the 8-hr ozone NAAQS) or regional haze reasonable progress demonstrations, State can take credit for emission reductions in--
  - The nonattainment area
  - The same State
  - A neighboring State that is part of a multistate nonattainment area
  - Another State
- These credits must be supported by an adequate technical demonstration

## Framework for Planning (cont)

- Areas affected by transport (ozone, PM<sub>2.5</sub>)
  - Attainment dates for areas affected will be aligned with those of areas contributing to nonattainment problem
  - Attainment demonstration through modeling unless EPA determines infeasible (e.g., certain mountain situations)
  - SIP implementation date and RFP
    - All measures needed for attainment at least 3 monitoring years before attainment date
    - Local controls at least 3 monitoring years before original presumptive attainment date
  - RACM/RACT
    - Met by measures needed for attainment
    - Extends to regional scale control strategy
  - Other requirements - same as for other traditional areas

# Comments from Small Entities

- Metro. Washington Council of Govt's
  - Comment: Counties within CMSA should be able to have different classifications.
    - Response: In certain cases, guidance would allow this.
  - Comment: Current process of setting emissions budgets for transportation conformity in "traditional" areas should remain intact.
    - Response: EPA not proposing any changes to traditional area transportation conformity related to budget setting.

# WEB SITES OF INTEREST

- Major Action Items to Reinvent Ozone and PM NAAQS and Regional Haze ("Action Items Matrix")
  - <http://ttnwww.rtpnc.epa.gov/implement/actions/htm>
- Small Entity Implementation Website
  - <http://ttnwww.rtpnc.epa.gov/implement>
  - Click on "Actions of Particular Interest to Small Entities"